

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOANN FONZONE,
Plaintiff,
v.

JOE OTERI, et al.,
Defendants.

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: **CIVIL ACTION**
: **No. 12-5726**
:
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:
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ORDER

AND NOW, this _____ day of _____, 2022, upon consideration of Plaintiff Joann Fonzone's Petition to Reopen Civil Action and Defendants' response thereto, it is **HEREBY ORDERED** that Plaintiff's Petition is hereby **DENIED**.

BY THE COURT:

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**DEFENDANT CHRISTOPHER BEE'S RESPONSE TO PLAINTIFF'S
PETITION TO REOPEN A CIVIL ACTION**

Defendant, Christopher Bee, by and through the undersigned counsel, hereby files this Response to Plaintiff's Petition to Reopen a Civil Action. In support thereof, Responding Defendant incorporates the attached Memorandum of Law. Responding Defendant respectfully requests that this Court deny Plaintiff's petition.

Date: July 30, 2022

JAMES J. BINNS, ESQUIRE

1125 Walnut Street

Philadelphia, PA 19107

P: 215-275-3000

F: 215-922-4001

James@jamesbinns.net

Attorney for the Defendant, Christopher Bee

/s/ James J. Binns

BY: _____

James J. Binns, Esquire

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**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT’S RESPONSE TO
PLAINTIFF’S PETITION TO REOPEN A CIVIL ACTION**

Defendant, Christopher Bee, by and through the undersigned counsel, hereby files this Response to Plaintiff’s Motion to Reopen a Civil Action and respectfully requests that the Court deny Plaintiff’s petition(s) (Docket Nos. 218 and 221) as wholly without merit. In support thereof, Defendant, Christopher Bee, adopts and incorporates by reference, the Memorandum of Law by Defendants City of Philadelphia, James Kisielewski, Lisenette Ortiz and Mark Kovacs.

Date: July 30, 2022

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Attorney for the Defendant, Christopher Bee

/s/ James J. Binns

BY: _____

James J. Binns, Esquire

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CERTIFICATE OF SERVICE

I hereby certify that on the date below, the Defendant's Motion has been filed on ECF and is available for viewing and downloading by all parties. A copy will also be sent via first class mail to:

Joann Fonzone
631 Primrose Lane
Allentown, PA 18104

Date: July 30, 2022

JAMES J. BINNS, ESQUIRE

1125 Walnut Street

Philadelphia, PA 19107

P: 215-275-3000

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James@jamesbinns.net

Attorney for the Defendant, Christopher Bee

/s/ James J. Binns

BY: _____

James J. Binns, Esquire